

DGR:BW
F. #2021R00935

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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Filed: October 3, 2022

CR-22-449
Judge Frederick Block
Mag. Judge Roanne L. Mann

UNITED STATES OF AMERICA

- against -

ZACHARY WILLIAMS,

Defendant.

I N D I C T M E N T

Cr. No. _____
(T. 18, U.S.C., §§ 2251(a), 2251(e),
2252(a)(2), 2252(b)(1), 2252(b)(2),
2253(a), 2253(b), 2261A(2)(B),
2261(b)(5), 2422(b), 2428(a) and 3551
et seq.; T. 21, U.S.C., § 853(p))

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THE GRAND JURY CHARGES:

COUNT ONE
(Receipt of Child Pornography)

1. On or about January 7, 2021, within the Southern District of New York, the defendant ZACHARY WILLIAMS did knowingly and intentionally receive one or more visual depictions, to wit: digital video and images depicted in the computer file with the name "894E805D-AB62-4745-9983-8D522AD604C2.MOV," using a means and facility of interstate and foreign commerce, and which visual depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means, including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions having been of such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 3551 et seq.)

COUNT TWO

(Sexual Exploitation of a Child – Jane Doe)

2. In or about March 2021, within the Eastern District of New York and elsewhere, the defendant ZACHARY WILLIAMS did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct, and attempt to do so, for the purpose of producing one or more visual depictions of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and which would be in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depictions were actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT THREE

(Coercion and Enticement – Jane Doe)

3. In or about March 2021, within the Eastern District of New York and elsewhere, the defendant ZACHARY WILLIAMS using one or more facilities and means of interstate and foreign commerce, to wit: mobile telephones, the Internet and mobile Internet applications, did knowingly and intentionally persuade, induce, entice and coerce an individual who had not attained the age of 18 years, to wit: Jane Doe, to engage in sexual activity for which a person can be charged with a criminal offense, to wit: criminal sexual

act in the third degree, in violation of New York Penal Law Section 130.40(2), and attempt to do so.

(Title 18, United States Code, Sections 2422(b) and 3551 et seq.)

COUNT FOUR
(Cyberstalking – Jane Doe)

4. In or about March 2021, within the Eastern District of New York and elsewhere, the defendant ZACHARY WILLIAMS did knowingly and intentionally use (i) an interactive computer service, electronic communication service and electronic communication system of interstate commerce and (ii) a facility of interstate commerce to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to Jane Doe, with the intent to injure, harass and intimidate Jane Doe.

(Title 18, United States Code, Sections 2261A(2)(B), 2261(b)(5) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND TWO

5. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged in Counts One and Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of: (a) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B or 2260 of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting, or traceable to, gross profits or other proceeds

obtained from such offenses; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property, including but not limited to:

(a) one Apple iPhone 12 with International Mobile Equipment Identity ("IMEI") number 356478840888109, which was seized on or about March 13, 2021 from the defendant in Galloway Township, New Jersey; and

(b) one Apple iPhone 7 with IMEI number 359168070277316, which was seized on or about March 19, 2021 from the defendant's residence in Manhattan, New York.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT THREE**

7. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Three, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2428(a), which requires the forfeiture of (a) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense including but not limited to:

(a) one Apple iPhone 12 with IMEI number 356478840888109, which was seized on or about March 13, 2021 from the defendant in Galloway Township, New Jersey; and

(b) one Apple iPhone 7 with IMEI number 359168070277316, which was seized on or about March 19, 2021 from the defendant's residence in Manhattan, New York.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2428(a); Title 21, United States Code, Section 853(p))

A TRUE BILL

Deighton Reed
FOREPERSON

By: AUSA Conor Poff

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2021R00935

FORM DBD-34

JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ZACHARY WILLIAMS,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 2251(a), 2251(e), 2252(a)(2), 2252(b)(1),
2252(b)(2), 2253(a), 2253(b), 2261A(2)(B), 2261(b)(5), 2422(b) and
3551 et seq.; T. 21, U.S.C., § 853(p))

A true bill.

Deighton Reid
Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Benjamin Weintraub, Assistant U.S. Attorney (716) 254-6519